

ZMO LAW PLLC

August 6, 2024

Via ECF

Hon. John G. Koeltl
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

*The defendant should
arrange to return his
electronic monitor to the
Government on September 10, 2024.
So ordered*

RE: *United States v. Saheed Dupree et al.*, 23 Cr. 583 (JGK)

Dear Judge Koeltl:

8/7/24 JGK
8/7/24 U.S.D.C.

This office represents the defendant Saheed Dupree in the above-captioned case. Mr. Dupree pleaded guilty and was sentenced on May 8, 2024 to 16 months' imprisonment. Mr. Dupree is due to surrender on September 13, 2024 to FCI Fort Dix. I write to request a modification of Mr. Dupree's release conditions to remove the electronic monitoring component.

I understand from assigned AUSA Courtney Scism that the government opposes this proposed modification.

However, Pretrial Services would like to obtain the electronic monitor from Mr. Dupree before he surrenders to Fort Dix, as it is often difficult for them to retrieve the monitors from the facilities. I am advised by Mr. Dupree's Pretrial Officer Francesca Piperato that Pretrial does not object to the removal of the bracelet now but would at least request its removal two days before Mr. Dupree's surrender date (to allow Pretrial time to obtain the equipment and for Mr. Dupree to travel to his designated facility).

Mr. Dupree has never violated the conditions of his release and continues to work with his Pretrial Services Officer as he prepares to surrender to serve his sentence. Because of his exemplary record on release and his acceptance of responsibility, we request that the monitor be removed as soon as possible.

For these reasons, Mr. Dupree's conditions of release should be modified to remove electronic monitoring.

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Thank you for your attention to this case.

Very truly yours,

Victoria Nicole Medley

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CC: Chelsea Scism, Esq. (via ECF)
U.S. Pretrial Services Officer Francesca Piperato (via email)